

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

**D-1 SEAN DIAZ-DE LEON,**

Defendant.

**CRIMINAL NO. 20-164 (PAD)**

**JOINT INFORMATIVE MOTION  
IN COMPLIANCE WITH COURT ORDER**

**TO THE HONORABLE COURT:**

**NOW COME** the United States of America and Defendant Sean Diaz-De Leon, by and through their undersigned attorneys, and very respectfully state as follows:

1. On November 8, 2021, this Honorable Court ordered the parties to file a joint motion informing the Court of the status of the case and pending discovery not later than today. (Doc. 107)
2. The COVID-19 pandemic continues to present limitations with: (1) Learned Counsel traveling to Puerto Rico, (2) experts and investigators beginning their investigations and making preliminary evaluations, (3) performing interviews of fact and mitigation witnesses and (4) defense counsel having confidential and meaningful conversations with their clients.
3. Learned Counsel for Mr. Diaz-DeLeon has been involved in a protracted RICO trial in the District of Maryland since November 2021. Learned Counsel

expects he will be finished around the first week of February 2022.

4. The parties request this Honorable Court to take notice of the foregoing and thereafter schedule a deadline for the next Joint Informative Motion in approximately 60 days.

**WHEREFORE** it is respectfully requested for this Honorable Court to take notice of the parties' compliance with its order issued at Document 107.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, on this 10<sup>th</sup> day of January 2022.

Respectfully submitted,

**ERIC A. VOS**  
**FEDERAL PUBLIC DEFENDER**  
**DISTRICT OF PUERTO RICO**

/s/ Joseph A. Niskar

By: JOSEPH A. NISKAR (G/03007)  
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/s/ Jose A. Contreras (w/ consent)

**JOSE A. CONTRERAS** (G/00612)  
Assistant U.S. Attorney  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing *Joint Informative Motion* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Joseph A. Niskar

**Joseph A. Niskar**